

MEDICAL

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INSPECTION REPORT NO. 79-01

Attached

☐ Appendix A

☐ Appendix B

☐ Appendix C

☐ Memo

Paul S. Friedman, M.D.  
1422 Chestnut St.  
Philadelphia, Pa 19102

Licensee contact: above Telephone no. 204-2103

License no. 37-00147-02 Last amendment and date: 11 3/21/74

Category: G, and Priority: IV, as of last amendment.

Inspection date(s): 7/3/79 Type of inspection: Routine  
Unannounced

SUMMARY OF FINDINGS AND ACTION

☐ No noncompliance, clear 591 issued

☐ Noncompliance, 591 issued

☒ Noncompliance, Appendix A

☐ Regional action Hq action

☐ Action on previous noncompliance, Appendix B

☐ Supplemental info, Appendix C

RECOMMENDATIONS

See basis in Appendix C or attached memo.

☐ Change Category to:                      ☐ Change Priority to:                     

☒ Next inspection date: 7/80 (as soon as renewal of license is completed)

PERSONS CONTACTED

David Bryant Chittick  
Dr P. S. Friedman, M.D.  
\_\_\_\_\_  
\_\_\_\_\_

Inspector: J. McHinness 7/16/79

Approved: J. Glenn for R. McChittick 7/18/79

INSPECTION PLAN AND REPORT NUMBER \_\_\_\_\_

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Plan approved: \_\_\_\_\_ Date: \_\_\_\_\_

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

| Inspection Items  | Scheduled for inspection | Post-inspection status | Module no. | 766 Time Info |
|---|--------------------------|------------------------|------------|---------------|
| Management meeting - Entrance and Exit Interviews<br>[REQUIRED] | ✓                        |                        | 30703B     | 1/2 hr.       |
| Initial Management Meeting                                      |                          |                        |            |               |
| Program requirements, MC 2B<br>[REQUIRED]                       | ✓                        |                        | 78710B     | 3/4 hr.       |
| Licensee Event Followup   |                          |                        | 92700B     |               |
| Followup on Inspector-identified problems                       |                          |                        | 92701B     |               |
| Followup on Noncompliance and Deviations                        |                          |                        | 92702B     |               |
| IE Bulletin/Immediate Action Letter Followup                    |                          |                        | 92703B     |               |
| Followup on Headquarters Requests                               |                          |                        | 92704B     |               |
| Followup on Regional Requests                                   |                          |                        | 92705B     |               |
| Independent Inspection Effort<br>[REQUIRED]                     | ✓                        |                        |            | 1/2 hr.       |
| Inspector Dispatched to Site                                    |                          |                        | 93700B     |               |
| Followup on Significant Event Occurring During Inspection       |                          |                        | 93701B     |               |

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

| INSPECTION ITEMS  | CRITERIA                         | FINDING      |
|---|----------------------------------|--------------|
| <b>1. Organization</b><br>Structure of organization as described in requirements?<br><br>NOTES & REMARKS:   | Lic Cond <u>15</u>               | _____        |
| <b>2. Licensee internal audits</b><br>Scope and frequency of audits as required?<br>Conducted by appropriate persons? Records maintained? Reviewed by management?<br>Deficiencies identified & corrected?<br><br>NOTES & REMARKS:   | Lic Cond <u>15</u>               | <u>_____</u> |
| <b>3. Training and qualification of personnel</b><br>Training & retraining conducted as required?<br>Written & oral exams conducted? Examination results reviewed by management?<br>Instructions to workers per 19.12?<br><br>NOTES & REMARKS:  | Lic Cond <u>N/A</u><br><br>19.12 | _____        |
| <b>4. Radiation protection procedures</b><br>Procedures available and implemented? Identify radiopharmaceutical and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of cadavers?<br>Emergency procedures for spills, etc?<br>Personnel understand procedures?<br><br>NOTES & REMARKS: | Lic Cond <u>678</u>              | _____        |

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

| INSPECTION ITEM   | CRITERIA       | FINDING |
|---|----------------|---------|
| 5. <u>Use of materials</u>  | Lic Cond _____ | _____   |
| Procurement and use as required?  |                |         |
| Special tests (moly breakthrough, leak tests, etc) required? - <i>N/A</i> |                |         |
| Dose calibration checks performed? <i>no dose calibrator</i>              |                |         |
| Posting & labeling as required? - <i>done</i>                             |                |         |
| 20.203  |                |         |
| NOTES & REMARKS:  |                |         |

6. Storage of materials

Material secured in both restricted and unrestricted areas? Adequately?

20.207

## NOTES &amp; REMARKS:

*isotopes stored in appropriate lab w/ CTA labels  
office locked after hours*7. FacilitiesLic Cond 15

As described in lic cond or application?

Any changes made? Adequacy?

## NOTES &amp; REMARKS:

8. InstrumentsLic Cond 15

Survey meters &amp; instruments adequate for program?

Instruments & meters operable? Calibrated?  
Calibration adequate?*NOTES & REMARKS: survey meter present - no batteries  
in it - not were any calibrations completed  
for several years*

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

| INSPECTION ITEMS  | CRITERIA      | FINDING    |
|---|---------------|------------|
| 9. <u>Receipt and transfer of material</u>  |               | <i>N/C</i> |
| Written procedures for pickup, receiving, opening packages?                               | <u>20.205</u> |            |
| Survey of packages when received?   | 20.205(c)(1)  |            |
| Records of survey of packages?  | 20.401(b)     |            |
| Transfer of materials proper? Transfer records maintained?                                | 30.41, 30.51  |            |
| Authorized containers used? Shipping papers & package labels proper for packages on hand? | 71.5          |            |

## NOTES &amp; REMARKS:

*packages of isotopes were delivered to Dr. Friedman home - he then brought them to the office*

10. Personnel protection - external

|   |                      |  |
|---|----------------------|--|
| Personnel monitoring controls adequate?     | <u>20.101</u> 20.202 |  |
| Exposures minimized?                        |                      |  |
| Exposure records (NRC-4 or 5) maintained?   | 20.102(b), 20.401(a) |  |
| Available for employee review?              |                      |  |
| Surveys conducted? Adequate?                | <u>20.201</u>        |  |
| Records of monitoring, surveys?             | 20.401               |  |
| Levels in unrestricted areas within limits? | 20.1, 20.105         |  |

## NOTES &amp; REMARKS:

*proper dosimetry not worn during preparation or apt. infection (No TLD rings - Dr. Friedman no dosimetry)*

11. Personnel protection - internal

|  |                  |  |
|--|------------------|--|
| Airborne concentrations in restricted areas?   | 20.103           |  |
| Exposures to minors?   | 20.104           |  |
| Posting of airborne radioactivity areas?   | 20.203(d)        |  |
| Survey, monitoring adequate for airborne radioactivity, surface contamination? Records maintained? | 20.201<br>20.401 |  |

## NOTES &amp; REMARKS:

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

| INSPECTION ITEM                              | CRITERIA                       | FINDING  |
|--|--------------------------------|----------|
| 12. <u>Effluent controls, waste disposal</u> |                                | <u>C</u> |
| Release of effluents controlled?             | 20.106, 20.303                 |          |
| Waste disposals controlled?                  | 20.301, 20.303, 20.304, 20.305 |          |
| Procedures, records maintained?              | 20.401, Lic Cond _____         |          |
| Surveys made? Adequate?                      | 20.401                         |          |

## NOTES &amp; REMARKS:

*stored for decay - monitored w/ GYM +  
discarded in normal trash.*

|  |                |          |
|--|----------------|----------|
| 13. <u>Notifications and reports</u>                         |                | <u>C</u> |
| To individuals.  | 19.13          |          |
| Overexposures, excessive levels & concentrations, incidents. | 20.403, 20.405 |          |
| Personnel exposures and monitoring, termination reports.     | 20.407; 20.408 |          |
| Theft or loss of licensed material.                          | 20.402         |          |

## NOTES &amp; REMARKS:

|  |          |          |
|--|----------|----------|
| 14. <u>Posting of notices</u>  |          | <u>C</u> |
| Part 20, license & documents, procedures, notice of violations posted? | 19.11(a) |          |
| NRC-3 posted?  | 19.11(c) |          |

## NOTES &amp; REMARKS:

|                                     |     |       |
|-------------------------------------|-----|-------|
| 15. <u>Other license conditions</u> | Lic | _____ |
|-------------------------------------|-----|-------|

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

| INSPECTION ITEMS | CRITERIA | FINDING |
|------------------|----------|---------|
|------------------|----------|---------|

16. Confirmatory measurements \_\_\_\_\_17. Independent inspection effort \_\_\_\_\_*Accountability for therapeutic implant services**Special dose considerations**Eyes**Determining**33 Xc procedures*18. Incidents and events \_\_\_\_\_

Any incidents of misadministrations,  
contamination, etc, not otherwise  
covered by reports?

## APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

| Reference                  | Basis for noncompliance  |
|----------------------------|--|
| Report item _____          | limits use of licensed material to   |
| 10 CFR _____               | 1422 Chestnut St, Phil. Pa. - Dr. Friedman's   |
| Lic Cond <u>10</u>         | office. - Contrary, packages of isotopes were  |
| Type n/c <u>infraction</u> | delivered to Dr. Friedman's home & later transported to his office for use.  |
| Report item _____          | - 20.103 - surveys of lab area have not been completed since 4/79.   |
| 10 CFR <u>20.201a/b</u>    | ↑  |
| Lic Cond _____             | - 20.202b - dosimetry not worn by Dr. Friedman during injections - Chief tech no. 7. During of method                  |
| Type n/c <u>infraction</u> | of determining exposure to fingertips  |
| Report item _____          | 20.201f - GM meter was inoperable at the time of this inspection - no battery loaded in it.                            |
| 10 CFR _____               |  |
| Lic Cond _____             |  |
| Type n/c _____             |  |
| Report item _____          | <del>_____</del> = safety practices.   |
| 10 CFR _____               | - no dose calibrator   |
| Lic Cond _____             | - no calibration of GM meter   |
| Type n/c _____             | - gloves not worn during syringe preparation   |
|                            | - syringe shields not used regularly.  |
|                            | - no segregation of rad. area from nonradial area (isotope room being used as a lounge (coffee cups, cigarettes, etc.) |
| Report item _____          |  |
| 10 CFR _____               |  |
| Lic Cond _____             |  |
| Type n/c _____             |  |



## APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

| Identification and summary of action taken | Status |
|--|--------|
|--|--------|

|                  |                 |                 |
|------------------|-----------------|-----------------|
| Report no: _____ | Type n/c: _____ | Describe: _____ |
|------------------|-----------------|-----------------|

|               |        |
|---------------|--------|
| Action taken: | OPEN   |
|               | CLOSED |

|                  |                 |                 |
|------------------|-----------------|-----------------|
| Report no: _____ | Type n/c: _____ | Describe: _____ |
|------------------|-----------------|-----------------|

|               |        |
|---------------|--------|
| Action taken: | OPEN   |
|               | CLOSED |

|                  |                 |                 |
|------------------|-----------------|-----------------|
| Report no: _____ | Type n/c: _____ | Describe: _____ |
|------------------|-----------------|-----------------|

|               |        |
|---------------|--------|
| Action taken: | OPEN   |
|               | CLOSED |

|                  |                 |                 |
|------------------|-----------------|-----------------|
| Report no: _____ | Type n/c: _____ | Describe: _____ |
|------------------|-----------------|-----------------|

|               |        |
|---------------|--------|
| Action taken: | OPEN   |
|               | CLOSED |

|                  |                 |                 |
|------------------|-----------------|-----------------|
| Report no: _____ | Type n/c: _____ | Describe: _____ |
|------------------|-----------------|-----------------|

|               |        |
|---------------|--------|
| Action taken: | OPEN   |
|               | CLOSED |

## APPENDIX C - SUPPLEMENTARY INFO \_\_\_\_\_

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

- ☐ Uncorrected/repeated noncompliance  
☐ Unusual occurrence, conditions, etc  
☐ Basis for change of Category or Priority

- ☐ Unresolved items  
☒ Inspector's comments

Dr Paul Friedmann's license is presently pending renewal. His old license in quite lax & it was discussed <sup>as to some</sup> procedures that he will probably be held to in the future when licensing responds to him.

Reinspection of his facility after renewal is completed would be advantageous to see if he begins to implement new policies.